

DANIEL G. BOGDEN
United States Attorney
KIMBERLY M. FRAYN
Assistant United States Attorney
333 Las Vegas Blvd. South, Suite 5000
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-6418

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

2:14-cr-00357-APG-VCF

Plaintiff,

vs.

STIPULATION FOR EXTENSION OF
GOVERNMENT'S TIME TO FILE
RESPONSE

(First Request)

DANIELLE PERREIRA,

Defendant.

IT is hereby stipulated and agreed by the United States of America, by and through DANIEL G. BOGDEN, the undersigned Assistant United States Attorney, Kimberly M. Frayn, and Todd Leventhal, Esq., counsel for Defendant DANIELLE PERREIRA, that the Government will have an extension of time to file the Government's response to Defendant Perreira's motion to suppress statement (Doc. No. 96), to a date and time convenient to the Court, but not less Monday, September 28, 2015, for the following reasons:

1. On August 18, 2015, Defendant Perreira filed a motion to suppress her statement (doc. no. 96). The Government's time to file its response to the motion to suppress is presently set for September 4, 2015. However, Government counsel will be out of the office on medical leave beginning on September 2, 2015, which is expected to last two weeks or more.

2. The parties agree to the brief extension of time for the Government to file its

1 responsive pleading, to wit: until September 28, 21015. The defendant is presently at liberty under
2 Pretrial Services supervision. The Government has not been notified of any non-compliance by the
3 defendant with the term of her pretrial release.

4 3. The brief requested delay will not unduely prejudice the defendant and is not made
5 merely for purposes of delay, but to allow the Govenrment continuity of counsel. Granting of this
6 request will not affect the trial in this matter, which is presently set for November 16, 2015.

7 This is the first request to extend time for the Government to file its response.

8 THEREFORE, the parties respectfully requests the Court to extend the Govenrment's time
9 to file its response to defendant Perreira's motion to suppress her statement (Doc. No. 96), to a date
10 and time convenient to the Court, but not before September 28, 2015.

11 DATED this 31st day of August, 2015.

12 DANIEL G. BOGDEN
13 United States Attorney

14 /s/ Kimberly M. Frayn
KIMBERLY M. Frayn
15 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

2:14-cr-00357-APG-VCF

Plaintiff,

vs.

DANIELLE PERREIRA,

Defendant.

ORDER

After considering the parties' stipulation agreeing to extend the Government's time to file its response to Defendant Perreira's August 18, 2015 motion to suppress statement (Doc. No. 96), to a date and time convenient to the Court, but not less than September 28, 2015, the Court hereby finds good cause to grant the Government's request.

THEREFORE, IT IS HEREBY ORDERED that the Stipulation For Extension Of Time to File Response is GRANTED and the Government shall file its response before midnight on Monday, September 28, 2015.

Dated this 31st day of August, 2015.



THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE COURT JUDGE